



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 2537
RETURN RECEIPT REQUESTED**

March 11, 2013

Stan Rihtar
Environmental Manager
ArcelorMittal Cleveland Inc.
3060 Eggers Avenue
Cleveland, Ohio 44105

**FACILITY ID: 13-18-00-1613
RE: 3060 Eggers Avenue
PROJECT ID: CL 12 249**

**RESOLUTION OF VIOLATIONS
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Rihtar:

On February 7, 2013, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring ArcelorMittal Cleveland Inc. (ArcelorMittal) to submit a corrective action plan in response to the following violations:

- o 40 Code of Federal Regulations (CFR) Part 61 Subpart M and Ohio Administrative Code (OAC) Rule 3745-20-03(D)(4), for failing to submit a revised notification; and,
- o 40 CFR Part 61.150(b)(1) and OAC Rule 3745-20-05(A), for failing to deposit asbestos-containing waste material at a waste disposal site operated in accordance with 40 CFR Part 61.154: Standard for active waste disposal sites.

CDAQ is in receipt of a corrective action plan dated February 25, 2013; CDAQ was advised that an accidental shipment of asbestos-containing debris had been taken to Republic Services (Lorain II Landfill) in September 2012. You explained that this was an isolated incident resulting from ArcelorMittal's failure to coordinate with Precision Environmental Company and CMM, Inc. Your letter also noted that the remaining work at the former Clark Railroad building was undertaken in full compliance with the 2012 blanket notification, NESHAP requirements and ArcelorMittal's internal procedures.

In preventing a recurrence, your corrective action plan stated that internal procedures were immediately reviewed with key employees in your Plant Services & Logistics Department. Additionally, a formal "asbestos control training" refresher course was conducted on February 13, 2013, and all Plant Services & Logistics Department supervisors attended the training.



The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for ArcelorMittal: 13-18-00-1613.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

Valencia White
Chief of Enforcement, CDAQ

VW/vls

cc: Bob Princic, DAPC, NEDO
Clarissa Gereby, DMWM, NEDO
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
John Savage, Precision Environmental Company
Michael Glenn, CMM, Inc.
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ROV+NEAR.docx

ArcelorMittal Cleveland
Flat Carbon Steel

ArcelorMittal

February 25, 2013

Certified Mail – Return Receipt Requested

Ms. Valerie Shaffer
Cleveland Division of Air Quality
75 Erieview Plaza – 2nd Floor
Cleveland, OH 44114-1839



Re: ArcelorMittal Cleveland, LLC
CDAQ Notice of Violation Dated February 7, 2013
(Project ID No. CL 12-249)

Dear Ms. Shaffer:

ArcelorMittal Cleveland, LLC (AM Cleveland) is submitting this letter in response to the February 7, 2013 Notice of Violation issued by the City of Cleveland Division of Air Quality (CDAQ), in which CDAQ alleges violations of the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP).

We appreciate the opportunity to advise CDAQ of the steps taken in response to the accidental shipment in September of approximately 100 square feet of asbestos-containing debris to Republic Services' landfill. This past fall, AM Cleveland initiated renovation activities at the Clark Railroad building. In connection with that project, we discovered that a limited amount of ACM debris (ceiling tile) apparently had been placed by mistake into a regular trash roll-off which had then been hauled away by Republic Services. Based upon our internal discussions, only about 100 square feet of debris was involved. Upon discovery of the situation, we notified Republic Services.

The remaining work at the former Clark Railroad building was undertaken in full compliance with the 2012 blanket notification, NESHAP requirements and our internal procedures, including oversight by Precision Environmental Company and CMM, Inc. A copy of the manifest for the remaining work is attached, showing shipment of ACM debris from a number of projects including the Clark Railroad renovation to American Landfill in Waynesburg, Ohio. We note that neither Precision nor CMM were involved in this incident (and so will not be separately responding to the February 7, 2013 NOV). Indeed, this isolated incident resulted from the failure to coordinate with Precision and CMM as required by our internal procedures. In addition to immediately re-reviewing these internal procedures with key employees in our Plant Services & Logistics Department (the individuals involved in coordinating routine demolition or renovation work at the plant), formal refresher training was conducted on February 13, 2013. All Plant Services & Logistics Department supervisors attended this training, at which Procedure/Practice No. 3.15 ("Asbestos Control Training") was thoroughly reviewed. Copies of Procedure/Practice No. 3.15 and the sign-in sheet for the February 13, 2013 training are attached.

ArcelorMittal Cleveland LLC
3060 Eggers Avenue
Cleveland, Ohio 44105

T +1 216 429 6396
F +1 216 429 6631
www.arcelormittal.com

ArcelorMittal Cleveland
Flat Carbon Steel

We are confident that the re-training of relevant personnel on our procedures for the management of asbestos-containing material (ACM) generated during on-site construction, renovation and demolition activities will prevent a recurrence. If you have any questions, or wish to discuss this matter further, please contact me at 216-429-6396.

Sincerely,



Stan Rihtar
Environmental Manager

cc (without enclosures):

John Savage – Precision Environmental
Michael Glenn – CMM, Inc.



City of Cleveland
Frank G. Jackson, Mayor

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Division of Air Quality
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 2481
RETURN RECEIPT REQUESTED**

February 7, 2013

Stan Rihtar
Environmental Manager
ArcelorMittal Cleveland Inc.
3060 Eggers Avenue
Cleveland, Ohio 44105

John Savage
Precision Environmental Company
5722 Schaaf Road
Independence, Ohio 44131

Michael Glenn
CMM, Inc.
546 Meadowridge Way
Hudson, Ohio 44236

RE: 3060 Eggers Avenue
PROJECT ID: 12 249
NOTICE OF VIOLATION : National Emission Standard for Hazardous Air Pollutants
(NESHAP) Asbestos Violations

Dear Mr. Rihtar:

This letter serves as notification that you are in violation of the following applicable air statutes, air regulations, or air permit conditions.

The Cleveland Division of Air Quality (CDAQ) has recently been informed that a load of approximately 100 square feet of non-friable Category II asbestos transite ceiling tile had been placed into a Republic Services' solid waste roll-off during the renovation of an ArcelorMittal Cleveland, Inc. (ArcelorMittal) railroad office. The asbestos-containing material was deposited at Lorain II Landfill sometime in late August or early September 2012.

Asbestos removal projects are subject to compliance with the Asbestos NESHAP, Title 40 Code of Federal Regulations (CFR) Part 61 Subpart M, the Ohio Administrative Code (OAC) Rule 3745-20, and the Ohio Revised Code Chapter 3704.05(G).

CDAQ has determined that ArcelorMittal is in violation of 40 CFR Part 61 Subpart M and OAC Rule 3745-20-03(D)(4), for failing to submit an amended (revised) notification and informing Ohio EPA of the change in the selected waste disposal site. The waste disposal



facility identified on ArcelorMittal's blanket notification for 2012, is American Landfill located at 7916 Chapel Street, in Waynesburg, Ohio. A copy of the 2012 notification submitted by ArcelorMittal is enclosed for your review.

Additionally, ArcelorMittal is in violation of 40 CFR Part 61.150(b)(1) and OAC Rule 3745-20-05(A), in that all asbestos-containing waste material was not deposited at a waste disposal site operated in accordance with the provisions of 40 CFR Part 61.154.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that ArcelorMittal Cleveland submit corrective action plan in response to the above-mentioned violations, to the following enforcement representative:

Valerie Shaffer
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Valerie Shaffer at (216) 287-2713. All correspondence with CDAQ must include the Ohio EPA project identification number for ArcelorMittal Cleveland: CL 12 249.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/vls

cc: Bob Princic, DAPC, NEDO
Clarissa Gereby, DMWM, NEDO
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
L:\Data\Facilities\+ Programs\Asbestos\Sites\ArcelorMittal Cleveland\2013-02-07
NOV.docx

encl: ArcelorMittal's Ohio EPA Notification of Demolition and Renovation for 2012

20-Aug-12	#3 PH - #3 BOILER - O/S ASH HOPPERS	E12-002	1205401-9002
20-Aug-12	84" HSM - #3 FCE	E12-003	1205401-9004
21-Aug-12	#1 STEEL PRODUCING - 2 SHOP	E12-005	1205401-9007
21-Aug-12	84" HSM - #3 FCE	E12-003	1205401-9004
22-Aug-12	E. SIDE BOF - SUB 125	E12-005	1205401-9007
23-Aug-12	PS&L LOCKER ROOM	E12-001	1205401-9009
23-Aug-12	FINISHING - COL. A28	E12-003	1205401-9003
24-Aug-12	E. SIDE BOF - SUB 125	E12-005	1205401-9007
27-Aug-12	84" HSM - #3 FCE - Pb	E12-003	1205401-9004
28-Aug-12	84" HSM - #3 FCE - Pb	E12-003	1205401-9004
29-Aug-12	E. SIDE BOF - SUB 125	E12-005	1205401-9007
30-Aug-12	E. SIDE BOF - SUB 125	E12-005	1205401-9007
30-Aug-12	#1 PH - B GENERATOR	E12-002	1205401-9001
31-Aug-12	E. SIDE BOF - SUB 125	E12-005	1205401-9007
31-Aug-12	W. SIDE BOF - 14" WATER LINE	E12-005	1205401-9005
4-Sep-12	CLARK RR - J2 BLDG	E12-001	1205401-9009
4-Sep-12	W. SIDE BOF - VIC. 94 FCE	E12-005	1205401-9005
5-Sep-12	#1 PH - FILTER FARM & C ASH HOPPERS	E12-002	1205401-9001
6-Sep-12	CLARK RR - J2 BLDG	E12-001	1205401-9009
7-Sep-12	CLARK RR - J2 BLDG	E12-001	1205401-9009
10-Sep-12	OLD INCINERATOR BLDG	E12-001	1205401-9009
11-Sep-12	#1 STEEL PRODUCING - 2 SHOP	E12-005	1205401-9007
12-Sep-12	OLD INCINERATOR BLDG	E12-001	1205401-9009
13-Sep-12	OLD INCINERATOR BLDG	E12-001	1205401-9009
14-Sep-12	OLD INCINERATOR BLDG	E12-001	1205401-9009
	SHIPPED 17 SEP 12	71628	RECEIVED

In Case of Emergency
Contact Enviroserve at 1-800-642-1311

**BILL OF LADING
MATERIAL MANIFEST**

1. Generator's US EPA ID No. (If applicable)
OHD004218673

Document No.
71627

2. Page 1
of 1

3. Generator's Name and Mailing Address

ARCELORMITTAL CLEVELAND, INC.
3060 EGGERS AVENUE, CLEVELAND, OH 44105

VARIOUS LOCATIONS-ASBESTOS

4. Generator's Phone (216) 429-6396 ATTN: STAN RIHTAR

5. Transporter 1 Company Name
ENVIROSERVE, J.V.

6 US EPA ID Number
OHD087050564

A. Transporter's Phone
(216) 642-1311

7. Transporter 2 Company Name
PennOhio Corporation

8. US EPA ID Number

B. Transporter's Phone
440 992-7462

9. Designated Facility Name and Site Address
AMERICAN LANDFILL INC.
7016 CHAPEL STREET S.E., WAYNESBURG, OH

10. US EPA ID Number
OHR000012484

C. Facility's Phone
(330) 866-3265 X319

11. Shipping Name and Description

a. RQ, NA2212, ASBESTOS, 9, PGIII (MIXED), ERG 171
109370 OH

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

1 CM 30 Y

FEB 27 2012

D. Additional Descriptions for Materials Listed Above

Box # 025

15. Special Handling Instructions and Additional Information

W/Label 77401B 1205401 9001-9009

16. GENERATOR CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately describe above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in in proper condition for transport by highway according to applicable international and nation governmental regulations.

Printed/Typed Name
S. Rihtar

Signature
S. Rihtar

Month Day Year
10 8 27 12

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name
JOSEPH M RINK

Signature
Joseph M Rink

Month Day Year
11 11 5 12

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name
Stephen Lower

Signature
Stephen Lower

Month Day Year
11 11 5 12

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature
AMS

Month Day Year
11 15 12

GENERATOR

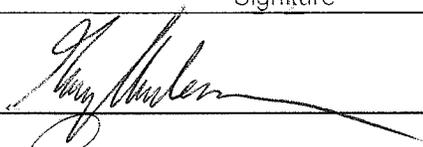
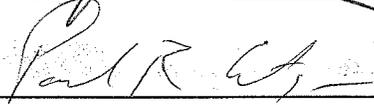
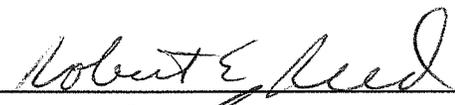
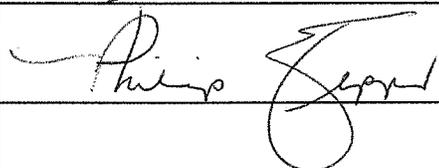
TRANSPORTER

FACILITY

ORIGINAL-RETURN TO GENERATOR

17-Oct-12	#1 PH - D FILTER TANK	E12-002	1205401-9001
18-Oct-12	#1 PH - D FILTER TANK	E12-002	1205401-9001
18-Oct-12	E. SIDE BOF - ELEVATOR CONTROL RM	E12-005	1205401-9007
19-Oct-12	#1 PH - D FILTER TANK	E12-002	1205401-9001
22-Oct-12	#1 PH - D FILTER TANK	E12-002	1205401-9001
23-Oct-12	E. SIDE BOF - S. END OF OLD MOLD YARD	E12-005	1205401-9007
23-Oct-12	#1 PH - S. END OF OLD 240 BOILER AREA	E12-002	1205401-9001
24-Oct-12	E. SIDE BOF - S. END OF OLD MOLD YARD	E12-005	1205401-9007
25-Oct-12	E. SIDE BOF - S. END OF OLD MOLD YARD	E12-005	1205401-9007
26-Oct-12	E. SIDE BOF - S. END OF OLD MOLD YARD	E12-005	1205401-9007
26-Oct-12	CLARK RR - J2 BLDG - UPSTAIRS	E12-001	1205401-9009
27-Oct-12	CLARK RR - J2 BLDG - UPSTAIRS	E12-001	1205401-9009
28-Oct-12	CLARK RR - J2 BLDG - UPSTAIRS	E12-001	1205401-9009
29-Oct-12	E. SIDE BOF - S. END OF OLD MOLD YARD	E12-005	1205401-9007
30-Oct-12	#1 PH - A FILTER TANK	E12-002	1205401-9001
31-Oct-12	#1 PH - A FILTER TANK	E12-002	1205401-9001
1-Nov-12	#1 PH - A FILTER TANK	E12-002	1205401-9001
2-Nov-12	#1 PH - A FILTER TANK	E12-002	1205401-9001
5-Nov-12	#1 PH - A FILTER TANK	E12-002	1205401-9001
6-Nov-12	CLARK RR - J2 BLDG - UPSTAIRS	E12-001	1205401-9009
6-Nov-12	CLARK RR - PACM TAR PAPER	E12-004	1205401-9008
7-Nov-12	84" HSM - 750 BLDG	E12-003	1205401-9004
8-Nov-12	84" HSM - 750 BLDG	E12-003	1205401-9004
8-Nov-12	#1 PH - UNDER C GEN	E12-002	1205401-9001
9-Nov-12	FINISHING - ABC BLDGS	E12-003	1205401-9003
	SHIPPED 12 NOV 12		71627 RECEIVED

**ArcelorMittal Cleveland Procedure/Practice No. 3.15 Asbestos
Control Training**

Date: 02/13/2013			Dept: Salary
Last Name	First Name	MI	Signature
Anderson	Gary		
Critzer	Paul		
Reed	Robert		
Rudnitskas	Todd		
Zeppo	Phil		

Printed documents are considered UNCONTROLLED and are to be used for training or reference purposes only. Uncontrolled documents are allowed (such as photocopies), but may not be used to perform the task defined in the procedure unless they are first verified as current.

3.15 Asbestos Control

This program applies to materials containing more than 1% asbestos and hereafter is referred to as asbestos-containing material (ACM).

I. PROCUREMENT OF ASBESTOS-CONTAINING MATERIALS (ACM)

The purchase of any asbestos containing material (ACM) is prohibited. Removal of asbestos containing materials must adhere to the procedures specified by Governmental Agencies or developed by ArcelorMittal Cleveland pursuant to agency requirements.

II. ASBESTOS PRESUMPTION

All thermal system insulation; sprayed or troweled on surfacing materials; ceiling, flooring, siding, wallboard and roofing materials; valve packing and gasket materials; and electrical insulation and mounting materials; **and vermiculite insulation used in electrical cable trays for fire suppression** are to be treated by anyone working as containing asbestos unless otherwise known as not containing asbestos. Employees who are likely to work where ACM is present are to be instructed to contact supervision if they are unsure as to the nature of materials where the work is to be performed. Disturbance or removal of the above listed materials must be done by trained and authorized persons if the material is ACM or if the composition with respect to the presence of asbestos is not known.

III. ASBESTOS ABATEMENT

The practice has been to have work involving asbestos performed by contract personnel. Only licensed asbestos abatement contractors and licensed transporters are to be used on abatement projects. The ArcelorMittal person who initiates work that may involve the removal of ACM is responsible for insuring the pre-qualifications requirements have been fulfilled prior to the work being performed. Pre-qualification of contractors is the responsibility of the Purchasing Department.

All asbestos removal projects that require notification to a federal, state or local agency for Class I project that requires the removal or disturbance of greater than 50 square feet or 50 linear feet of asbestos-containing materials or presumed asbestos-containing materials shall require a third party asbestos specialist to oversee work done by the abatement contractor. The specialist shall conform to the requirements set forth in Specification 26A.0.

ArcelorMittal obtains a master and back-up contract with a licensed abatement contractor to conduct routine maintenance type asbestos removal, encapsulation or clean-up work. The procurement of a master contractor is to be coordinated through the Purchasing Department. The Purchasing Department must coordinate selection of a contractor for asbestos abatement jobs requiring competitive bidding.

All asbestos removal work shall conform to federal, state and local codes. The removal of asbestos-containing materials as with any contracting work are subject to provisions of labor agreements with USWA. As such, an annual review of anticipated usage of contractors and an individual project notice prior to letting a contract are required.

Procedure/Practice No.: 3.15		Page 2 of 9
Title: Asbestos Control		

No individual is permitted to enter a regulated area established by a contractor unless they meet the regulatory requirements to enter a regulated area and are authorized to do so.

IV. ROUTINE MAINTENANCE

Class III work involves the disturbance of asbestos during routine maintenance operations. Routine maintenance work involving removal and replacement of intact non-friable removal of electrical insulation and mounting materials; removal of intact transite and galbestos (three panels or less); and removal of intact gasket materials is considered to be Class III work and can be performed by trained ArcelorMittal employees. All intact Gaskets removed by ArcelorMittal employees are still subject to regulatory handling, labeling and disposal requirements, Non-intact Gasket removal is to be performed by contract personnel. Non-intact means that "ACM has crumbled, been pulverized or otherwise deteriorated so that it is no longer bound with its matrix or may become so during routine handling and/or maintenance task assigned.

Large scale removal or any construction related activity involving asbestos is not considered to be maintenance work and must be performed by an approved and licensed asbestos abatement contractor.

Crane and machinery brakes that have not been replaced within the last ten years may contain asbestos. All facilities are to institute work practices that insure asbestos fibers do not present an exposure hazard while performing brake and clutch repairs if a negative exposure assessment has not been made. The use of wet methods or solvent spray methods prescribed by OSHA for automotive brake repair should be utilized, wherever feasible, for crane and machinery brakes suspected of containing asbestos.

V. EMPLOYEE TRAINING

ArcelorMittal employees who may work in areas where asbestos is present or perform maintenance work where there may be a potential for an exposure to airborne asbestos fibers are to be provided asbestos awareness information using the Asbestos Information Guide. Additionally, in accordance with the Memorandum of Understanding between AISI and OSHA, employees who perform Class III asbestos work (routine maintenance involving the disturbance of asbestos) shall receive training on the following topics:

- ◆ The health effects associated with asbestos;
- ◆ The types of structural components and materials at the facility that should be deemed to contain asbestos;
- ◆ The relationships between smoking and asbestos in producing lung cancer and information regarding public health organizations that offer smoking cessation programs or materials;
- ◆ The nature of operations that could result in exposure to asbestos and any protective controls and work practices necessary to minimize asbestos exposure and any necessary instructions in the use of these controls and practices;
- ◆ The purpose, proper use, fitting instructions and limitations of respirators when required by 29 CFR 1910.134.
- ◆ Applicable criteria for providing asbestos related medical surveillance;
- ◆ The content or subjects of the Standard and its Appendices that are relevant to the employee's work activities; and
- ◆ An explanation of the Hazard Communication and Labeling requirements.

Procedure/Practice No.: 3.15		Page 3 of 9
Title: Asbestos Control		

A detailed review of the information guide should be used as a basis for Class III training. This training should be supplemented with additional training on specific control measures applicable to the work performed by the employee. Previous training or on-the-job training is in compliance with the requirements for hands-on training.

Janitorial service employees who perform housekeeping activities in areas which contain ACM or PACM are to be provided annual training on the health effects of asbestos; locations of ACM and PACM in the facility; recognition of ACM and PACM damage and deterioration; proper housekeeping methods and proper response to fiber release episodes.

Employee training conducted in accordance with this program is to be documented.

VI. RECORDS

Records of where asbestos is known to be present and the locations where asbestos is suspected based on reasonable knowledge and experience are to be kept.

Final submittals required by Contractor Asbestos Specification 26.0 are to be maintained by the safety reps.

VII. LABELING

Signs are to be posted in readily accessible areas to inform employees, visitors, or contract employees of the presence of asbestos. The legend is to read as follows:

<p>WARNING</p> <ul style="list-style-type: none"> • THERMAL SYSTEM INSULATION (e.g., PIPES, DUCTS, TANKS, FURNACES, BOILERS) • SPRAYED OR TROWELED-ON SURFACING MATERIALS • ROOFING, SIDING, FLOORING, CEILING, AND OTHER STRUCTURAL COMPONENTS • VALVE PACKING AND GASKETING MATERIALS • ELECTRICAL INSULATION AND MOUNTING MATERIALS • VERMICULITE INSULATION (e.g., USED ON ELECTRICAL CABLE TRAYS FOR FIRE SUPPRESSION) <p>MUST BE TREATED AS ASBESTOS UNLESS DETERMINED TO BE NON-ASBESTOS CONTAINING MATERIAL. WORK THAT DISTURBS OR REMOVES THESE MATERIALS MUST BE DONE BY AUTHORIZED PERSONS IF THE MATERIAL CONTAINS ASBESTOS OR THE COMPOSITION IS NOT KNOWN. CONTACT YOUR SUPERVISOR TO HAVE A DETERMINATION MADE.</p> <p style="text-align: center;"><i>ASBESTOS IS A CANCER AND LUNG HAZARD</i></p>
--

It is recommended the signs be posted in departmental information centers, at clock houses and any other areas where employees and contractors are likely to see the signs.

VIII. HOUSEKEEPING

All spills and sudden releases of ACM shall be cleaned up as soon as possible using wet methods or HEPA vacuum cleaners by trained and authorized personnel. Clean up and repair of source materials shall be done by a licensed contractor. Disposal must be done using sealed impermeable bags or closed containers in accordance with Section IX.

Procedure/Practice No.: 3.15		Page 4 of 9
Title: Asbestos Control		

All employees who perform housekeeping activities shall be advised that the sanding of flooring containing asbestos is prohibited and stripping of finishes shall be done using low abrasion pads at speeds lower than 300 rpm and wet methods. Burnishing or dry buffing may be performed on asbestos flooring if the flooring has sufficient finish so the pad cannot contact the asbestos in the flooring.

Compressed air may not be used for general cleaning except for electrical motors or electrical components provided it is not feasible to clean the component in any other manner and the asbestos-containing material is likely to remain intact.

IX. TRANSPORTATION AND DISPOSAL OF ACM

Asbestos-containing waste leaving an ArcelorMittal plant must have a properly completed Waste Shipment Record, as approved by the Environmental Department. The use of new disposal sites is to be approved by Environmental and Purchasing prior to initiating the work/shipment.

Contractors are required to obtain ArcelorMittal approval for the disposal site prior to the beginning of a project. The Environmental Department must be notified of transporters and waste disposal facilities being considered for use by the abatement contractor. The facility environmental designee is responsible for entering the appropriate information on the manifest.

X. WORK AREA CLEARANCE

The work will be determined completed when the work area is visually clean by passing a visual inspection and/or air sampling (if required by regulation or ArcelorMittal).

The ArcelorMittal person initiating the request for asbestos abatement services is responsible for insuring satisfactory completion of the work. If a visual inspection is made, clearance criteria will be met when ArcelorMittal or its third party manager confirms that no visible asbestos-containing material is present on the substrate or within the work area.

For any work requiring the use of a negative pressure enclosure (NPE), the pressure differential system shall remain in operation until receipt of final clearance from ArcelorMittal. On projects with third party oversight, the third party representative shall act in behalf of ArcelorMittal. The contractor shall be responsible for notifying the ArcelorMittal representative (i.e., third party) that the work has been completed.

At the completion of asbestos removal activities, all equipment, machinery, scaffolding, tools, etc., used by the contractor is to be cleaned by the contractor or wrapped in polyethylene sheeting and removed from the work area.

If directed by ArcelorMittal that the abatement project requires additional clearance using air monitoring, the clearance criteria will be met if the level of asbestos fibers per cubic centimeter of air (f/cc) is confirmed to be not greater than 0.01 f/cc by PCM Analysis or the levels are not more than the background levels before the work was initiated.

XI. ROOFING, TRANSITE AND GALBESTOS REMOVAL BY CONTRACTORS

Roofing

Removal of roofing material shall be done intact to the extent feasible. Wet methods are to be utilized unless it is not feasible or the contractor's competent person determines that the

Procedure/Practice No.: 3.15		Page 5 of 9
Title: Asbestos Control		

worker's safety would be jeopardized. Non-intact roofing materials must be wetted (if the competent person deems it appropriate) or wrapped while on the roof. Intact roofing must be lowered to the ground no later than the end of the work shift and transferred to a closed receptacle. Dust-tight chutes also may be used as a means of lowering the asbestos-containing roofing material.

Intact roofing need not be wrapped unless required by regulation or by ArcelorMittal Environmental Department. Roof air intakes in the regulated area are to be isolated with plastic, extended or a 20 ft. buffer zone established. The contractor must advise ArcelorMittal if air systems or air vents need to be isolated.

Transite

Transite is classified under NESHAP as a Category II non-friable asbestos-containing material. All category II non-friable ACM is required by OEPA and ArcelorMittal to be disposed of at an approved landfill licensed to accept regulated (friable) asbestos waste.

Notification under NESHAP is required for the following transite removal activities:

- all building demolitions.
- when a planned renovation involves all of the following conditions:
 - ⇒ transite that contains 1% or more asbestos
 - ⇒ transite that is in a pre-removal condition that meets Category II requirements (i.e. non-friable)
 - ⇒ the removal methods described above cannot be utilized and those used will crumble, pulverize or reduce to powder and result in the transite becoming a Regulated ACM (RACM)
 - ⇒ 160 square feet or more of the material is to be removed.
- when a planned renovation involves transite that contains 1% or more asbestos and is in a pre-removal condition that no longer meets Category II requirements (i.e., has become friable through deterioration and therefore shall be treated is a RACM).
- when state or local asbestos removal notification regulations are applicable and are more stringent than EPA NESHAP.

Galbestos

Galbestos is classified under NESHAP as a Category I non-friable asbestos containing material. The proper removal of galbestos does not result in fiber releases. It is the practice of ArcelorMittal that galbestos cannot be cut with a torch, sanded, grinded, or abraded during removal.

Notification under NESHAP is required for the following galbestos removal activities:

- all building demolitions
- when a planned renovation involves all of the following conditions:

Procedure/Practice No.: 3.15		Page 6 of 9
Title: Asbestos Control		

- ⇒ galbestos that contains 1% or more asbestos
- ⇒ galbestos is in a pre-removal condition that meets Category I requirements (i.e.. non-friable)
- ⇒ removal methods include the use of a rotating blade or other method that similarly damages the material and results in the galbestos becoming a RACM
- ⇒ the amount of galbestos to be removed is 160 square feet or more if it is not a roof or 5,580 square feet or more if it is a roof.

- when a planned renovation involves galbestos that contains 1% or more asbestos and is in a pre-removal condition that no longer meets Category I requirements (i.e., has become friable through deterioration and therefore shall be treated as a RACM).
- when state or local asbestos removal notification regulations are applicable and are more stringent than EPA NESHAP.

According to NESHAP requirements, if the methods utilized for the removal of galbestos do not result in friable asbestos material, the waste generated is not considered a RACM and may be disposed of with other construction debris. However, permission to dispose of galbestos as construction debris must first be obtained from Environmental Department. If removal of galbestos results in friable material, the galbestos dust and debris generated must be considered a RACM and disposed of as an asbestos waste. The remaining large portions of the galbestos debris may be considered non-RACM provided that the edges that were subjected to abrasive activities have been encapsulated and effectively rendered non-friable. Galbestos waste that is disposed of as non-RACM is not permitted to go to a disposal facility that would sand, grind, cut, or abrade or otherwise turn it into RACM waste.

XII. ABATEMENT RELATED NOTIFICATIONS

The abatement contractor shall be responsible for all federal, state and local notification requirements. A copy of all notification correspondence shall be sent also to the ArcelorMittal project coordinator.

DEFINITIONS:

Asbestos-Containing Material (ACM) - Material containing more than 1% asbestos.

Surfacing Material - Material sprayed or troweled on surfaces for acoustical, fireproofing or other purposes.

PACM - Presumed asbestos-containing material from thermal system insulation and sprayed or troweled on surfacing material in buildings constructed on or before 1980.

TSI (Thermal System Insulation) - ACM applied to pipes, fittings, boilers, tank ducts or other structural components to prevent heat loss or gain.

At AISI member companies, TSI does not include transite; galbestos; gaskets; valve packing; floor tiles; or electrical mounting, electrical insulators, electric wire coverings and other materials used in electrical applications.

Class I Asbestos Work - Removal of TSI and surfacing ACM and PACM which cannot be contained in one 60 inches by 60 inches glove or waste bag.

Procedure/Practice No.: 3.15		Page 7 of 9
Title: Asbestos Control		

Class II Asbestos Work - Activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics in quantities that cannot be contained in one 60 inches by 60 inches glove bag or waste bag.

At AISI member companies, repair or replacement of not more than three panels of intact asbestos-containing transite, galbestos or other similar materials is considered to be Class III Asbestos Work.

Class III Asbestos Work - Repair and maintenance operations where ACM, including thermal system insulation and surfacing material, is likely to be disturbed.

At AISI member companies, Class III work is considered to be work activities involving 1) the disturbance of removal and clean-up of any work area in one day where the amount of ACM or PACM can be contained in one glove bag or waste bag that does not exceed 60" in length and width; 2) building maintenance involving the repair or replacement of no more than three panels of intact asbestos-containing transite, galbestos or similar material in any work area within one day. (A damaged or cracked panel shall be considered intact if it meets the definition of intact in the Asbestos Construction Standard); 3) maintenance work involving the removal or replacement of wiring or electrical components containing ACM, if the ACM is likely to be disturbed, and Class IV if the ACM is not disturbed.

Class IV Asbestos Work - Maintenance and custodial activities during which employees contact but do not disturb ACM or PAM and activities to clean up ACM and PACM waste and debris resulting from Class I, II, and III activities.

Competent Person - One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous or dangerous to employees and has authorization to take prompt corrective measures to eliminate them. In addition, one who is capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure and has the authority to take prompt corrective measures to eliminate them. For Class I and II work, trained in a training course meeting criteria of EPA's Model Accreditation Plan for supervisors or its equivalent (40-hour total with 14 hours hands on). For Class III and IV work, trained in a manner consistent with EPA requirements of local agency maintenance and custodial staff (16 hours). For Class III work involving one type of generic work, i.e., roofing, the competent person need only eight hours of specific training. Competent person need not be a supervisor.

Critical Barrier - One or more layers of plastic sealed over all openings into a work area or any other similarly placed physical barrier sufficient to prevent the migration of asbestos fibers.

At AISI members companies, where critical barriers are used, the area within the critical barriers need not be sealed or maintained under negative pressure unless the barriers are part of the structure of a negative pressure enclosure system for Class I work that is being performed.

Demolition - Wrecking or taking out any load supporting structure and any related razing, stripping or removal of asbestos.

Procedure/Practice No.: 3.15		Page 8 of 9
Title: Asbestos Control		

Disturbance - Activities that disrupt, crumble, pulverize or generate visible debris from ACM or PACM. Disturbance includes cutting no more than the amount that can be contained in one 60" by 60" glove or waste bag.

Glove bag - Not more than 60" by 60" impervious plastic bag-like enclosure affixed around an asbestos-containing material, with glove-like appendages through which material and tools may be handled.

Intact - ACM has not crumbled, been pulverized or otherwise deteriorated so that the asbestos is no longer likely to be bound with its matrix.

Negative Exposure Assessment - Means a determination by a competent person that employee exposure during an operation is expected to be consistently below the PEL.

Regulated Area - Area where Class I, II and III work is conducted and any adjacent area where waste and debris can accumulate and an area where airborne concentrations of asbestos exceed or are reasonably expected to exceed the PEL.

Repair - Overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates.

Removal - All operations where ACM or PACM is taken out or stripped from structures or substrates including demolition.

Renovation - Modification of an existing structure or portion thereof.

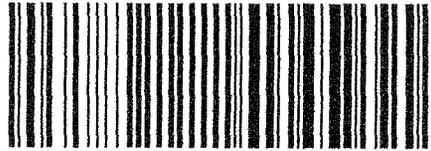
Permissible Exposure Limits:

TWA - 0.10 fibers/cc of air as an 8-hour time weighted average.

Excursion limit - 1.0 fibers/cc of air averaged over a 30-minute sampling period.

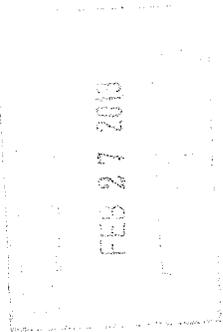
This document is not intended to be all inclusive and questions regarding the application of this information should be directed to a safety representative. As a result more specific procedures or modification of this document may be required.

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